REMARKS

Claims 1-15 are all the claims pending in the application.

Claims 1 and 5-7 have been amended to further define the scope of Applicant's claimed invention.

Claims 8, 10, 12 and 13 have been canceled without prejudice or disclaimer.

The Examiner rejects all of the pending claims under 35 U.S.C. §103(a) as being unpatentable over previously-cited U.S. patent No. 5,808,624 to Ikedo (Ikedo '624) in view of newly-cited U.S. patent No. 5,831,590 to Ikedo (Ikedo '590).

Applicant respectfully traverses this rejection as follows.

As explained in Applicant's previous Response filed March 29, 2004, Applicant's claimed invention provides apparatuses and a method, for creating a portrait by combining portrait parts, comprising unique combinations of features (claims 1, 5 and 6) and method steps (claim 7), including *inter alia*, *inputting edition orders to edit an image of the parts, and a computation unit for deforming* (by, for example, moving, rotating, inverting, expanding, and/or compressing) and *editing the images of portrait parts in accordance with the orders*.

The Examiner acknowledges that Ikedo '624 "is silent about 'inputting edition orders to edit dots and/or lines on said image'" [as recited in Applicant's independent claims 1, 5, 6 and 7]" (see Office Action, page 4). In fact, as explained in Applicant's March 29, 2004 Response, Ikedo '624 does not in any way teach or suggest editing an image of a portrait part, or inputting an edition order for doing so, as required by Applicant's independent claims 1, 5, 6 and 7.

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The Examiner alleges that Ikedo '590 supplies the above-noted deficiency of Ikedo '624.

Applicant respectfully disagrees.

Ikedo '590 discloses a composite picture editing device where:

> when a plurality of candidate patterns of one of the picture components is displayed, currently selected patterns for the other picture components is combined to each of the candidate patterns. Further, a mouse is provided to select one of the candidate patterns displayed. (see Id., Abstract; see also Id., col. 1, line 41 through col. 3, line 9).

Applicant respectfully submits that selection of patterns of picture components, as disclosed in Ikedo '590, has nothing to do with inputting edition orders to edit an image of the parts, and a computation unit for deforming (by, for example, moving, rotating, inverting, expanding, and/or compressing) and editing the images of portrait parts in accordance with the orders, as recite in Applicant's independent claims 1, 5, 6, and 7.

The portion of Ikedo '590 cited by the Examiner, and reproduced below in its entirety, discloses nothing more than the conventional operation of a mouse pointer for selecting an item displayed on a computer screen (for example, "selection of one of the candidate patterns displayed on display 4", see Id. as reproduced below).

> Various control commands can be input through the keyboard 2 when the composite picture is created. Further, with use of the mouse 3, selection of one of the candidate patterns displayed on the display 4, or selection of a menu can be done. By moving the mouse 3 on a desk, moving amount and direction are input to the CPU 11 through the interface I/F. By pressing a mouse button 3B provided on the mouse 3, a predetermined signal is input to the CPU 11 through the interface I/F.
> The CPU 11 displays an image corresponding to the program being executed, and further a mouse pointer (not shown) on the display 4. The displayed position of the mouse pointer on the display 4 changes as the mouse 3 is moved on the desk.

In the description hereinafter, an operation such that positioning the mouse pointer on a dot or an area on the display 4 and pushing the mouse button 3B and releasing the mouse button 3B immediately is defined as a click operation. For example, when the description says that "a button is clicked", it means that the mouse pointer is positioned on "a button" displayed on the display 4, and then the mouse button 3B is pushed and released immediately.

When the CPU 11 starts an composite picture editing program, an image editing window 40 as shown in FIG. 3 is displayed on the screen 4S of the display 4. The displayed position of the screen 4S can be changed on the screen 4S. In order to change the position of the image editing window 40, the mouse pointer is positioned on a title bar 401 of the image editing window 40, and move the mouse 3 with holding the mouse button depressed.

The image editing window 40 includes a category display area 410 and a composite image display area 420. The category display area 410 indicates a category, or a type of the composite picture to be edited. In the embodiment, ten different categories are provided, and for respective categories, small pictures representing the categories (for example, 412-416) are displayed in the category display area 410. (Id., col. 3, line 65 through col. 4, line 34)

Clearly, the mouse pointer operation of Ikedo '590 does not in any way teach, or even remotely suggest, inputting edition orders to edit dots and /or lines on images, as recited in Applicant's independent claims 1, 5, 6 and 7.

In addition, neither Ikedo '624, nor Ikedo '590, discloses, teaches, or even remotely suggests inputting an edition order, *in the form of a sequence of coordinates of at least one of a segment and a dot train*, for editing dots and/or segments and/or dot trains on said image. (See, for example, a non-limiting implementation of such a feature, as described in Applicant's specification at page 8, lines 20-24 and page 11, lines 14-20).
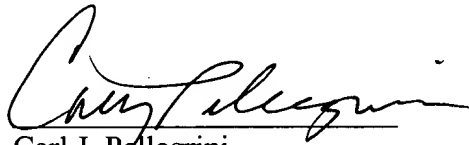
Therefore, Applicant's independent claims 1, 5, 6 and 7, as well as the dependent claims 2-4 and 8-18 (which incorporate all the novel and unobvious features of their respective base

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claims), would not have been obvious from any reasonable combination of Ikedo '624 and Ikedo '590 at least for these reasons.

In view of the foregoing, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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